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ILLINOIS COMMERCE COMMISSION)
On Its Own Motion)
-vs-) Docket No. 00-0699
Central Illinois Light Company)
Requirement to initiate program of)
tree trimming and vegetation management)

EXCEPTIONS ON BEHALF OF
CENTRAL ILLINOIS LIGHT COMPANY

In accordance with the Brief on Exceptions submitted with these exceptions, Central Illinois Light Company (CILCO) submits the following exceptions to the Hearing Examiner's Proposed Order (HEPO) dated April 19, 2001.

1. For the reasons stated in CILCO's Brief on Exceptions, Section III.A.3, beginning on page 6 the HEPO should be modified as follows:

3. Commission Conclusion

In determining what authority it has over tree trimming, ~~the Commission agrees with Staff that more than just Section 8-505.1 of the Act is applicable. Accordingly, the Commission concludes that CILCO's view of the sections of the Act relevant to this proceeding is too narrow. Furthermore, the Commission finds that the guidelines of the International Society of Arboriculture are not, despite what CILCO suggests, the only guidelines or standards that electric public utilities have been directed to follow. Notably, as Staff pointed out, Section 8-505.1 requires electric public utilities to follow the most current applicable OSHA or ANSI standards. Among the ANSI standards, which will be discussed further below, are recommendations that those pruning for utility purposes consider tree health and the natural shape of trees.~~

As for statutory authority, that the Commission has at least some authority over an electric public utility's vegetation management practices under Sections 4-101, 8-101, 8-401, 8-505, 8-505.1, and 16-125 can not be disputed. The Act and

Commission rules promulgated thereunder require electric public utilities to provide safe, reliable, and efficient service. Interference by trees with electric conductors ~~impacts~~ *effects* an electric utility's ability to provide service. Whether an electric utility has sufficiently trimmed trees and otherwise managed vegetation so as to maintain the appropriate quality of service is clearly within the Commission's authority to investigate. If it is determined that an electric utility is not meeting its tree trimming obligations, it is also within the Commission's authority to issue an order requiring that corrective action be taken, and in some instances outline the steps that are to be taken to achieve compliance with the Act and the Commission's rules.

With regard to whether the Commission has the authority to require that which it did in Finding 7 of its November 1, 2000 Order, as a general matter it can not be said that the establishment of a maximum tree trimming cycle and the requiring of regular reports concerning tree trimming activities are beyond the Commission's authority. *CILCO's application for rehearing questioned the Commission's authority to enter such an order without providing the utility an opportunity to be heard. This issue has become moot because the Commission granted rehearing and CILCO agreed to the establishment of a maximum tree trimming cycle.* As described in the record, regular tree trimming is necessary to ensure adequate line clearance. Failure to maintain adequate line clearance can result in significant safety concerns. Because safety is among the fundamental areas of jurisdiction repeatedly conferred upon the Commission by the Act, the Commission may direct an electric utility to establish a tree trimming cycle no longer than a specified number of years. To keep itself informed of the manner and method by which an electric utility manages vegetation and to ensure that it complies with the Commission's directives concerning tree trimming, the Act also permits the Commission to require the reasonable recording and reporting of information. The Commission's authority to require that CILCO conduct inspections of at least ten percent of tree trimming work performed by each contract crew is not contested by CILCO.

The remaining requirements in the November 1, 2000 Order are contained in Finding 7(A) and, as noted above, direct CILCO to consider the rights of property owners, public and worker safety, electric service reliability, previous pruning history, tree health, tree aesthetics, and efficient work production. As previously discussed, the Act gives the Commission authority over safety; therefore any reasonable requirement that an electric public utility consider public and worker safety in its management of vegetation is within the Commission's jurisdiction. Similarly, electric service reliability is unquestionably within the Commission's purview so any reasonable directive that an electric public utility consider reliability when trimming trees is permissible.

With regard to property owners' rights, the Commission agrees with Staff that the owner of property on which CILCO intends to trim trees should receive adequate notice of CILCO's intentions. This notion may be traced to Section 8-505.1(a). However, the Commission believes that its authority under Section 8-505.1 is limited to investigating and issuing complaints against utilities for not following the notice requirements and tree trimming guidelines specified in subsection (a) of Section 8-505.1. The Commission is not empowered to adjudicate the property rights of the owners of easements and the underlying property. The enforcement of property rights falls with the province of local courts, which are better suited for resolving disputes involving common law property rights. CILCO correctly noted in its Brief on Exceptions that the courts do not grant injunctive relief or enter stay orders without certain fundamental protections. These protections include a showing of a likelihood of success on the merits, a threat of irreparable damage that cannot be adequately remedied by an award of monetary damages, and most importantly, the posting of a bond to cover CILCO's costs if the injunction was improper. The Commission lacks authority to award damages, require a bond, or issue injunctions. The Commission also lacks the authority held by courts to impose monetary sanctions against litigants to discourage bad faith pleadings intended solely to harass or delay the utility. — The Commission's authority to protect customers' rights generally can also be considered to extend to the property of customers. Therefore, as a general matter, the Commission concludes that it may direct an electric utility to consider the rights of property owners when managing vegetation.

The Act also requires that all public utilities provide service which is in all respects efficient. Staff recommends that the Commission continue to require that CILCO consider efficient work production when trimming trees. Staff witness Buxton essentially describes efficient work production as requiring the balancing of cost with the other competing interests inherent to vegetation management. Regardless of which interests are identified, the Commission agrees with Mr. Buxton that competing interests must be balanced. Requiring that an electric utility do so is reasonable and within the Act's mandate that service be provided efficiently.

Two of the three remaining factors in Finding 7(A), previous pruning history and tree health, are closely related. As Mr. Buxton describes it, past pruning practices which are now out of favor may have negatively impacted the health of certain trees. When the previous pruning history of a tree is known, Staff contends that CILCO should look for and take into account the existence of any diseased or weak wood which may have resulted from past pruning. Diseased or weak wood is more apt to break off from a tree in inclement weather and may fall into any nearby electric conductors, affecting safety and reliability. Previous pruning history and tree health along with the third remaining factor, tree aesthetics, constitute considerations in tree trimming that, despite CILCO's assertions, are encompassed within the

~~standards that Section 8-505.1 requires public utilities to follow. Specifically, the ANSI standard practices for tree, shrub, and other woody plant maintenance which state that utilities should consider tree health and the natural shape of the tree. (ANSI A300-1995, Sections 5.7.2.1.1 and 5.7.2.1.2, respectively) The Commission understands the ANSI reference to the "natural shape of the tree" to refer to aesthetics. Accordingly, the Commission has the authority to direct an electric utility to consider previous pruning history, tree health, and the natural shape of the tree and tree aesthetics when trimming trees.~~

~~That many considerations exist when managing vegetation is should be apparent by now. Staff described this myriad of considerations as inherent to the tree trimming process. The Commission agrees and finds that it would not be easy or practical, given the many competing interests, to attempt to separate certain considerations when directing electric utilities to manage vegetation. The Illinois General Assembly must have recognized this fact, along with the fact that trees serve a variety of functions, when it granted to the Commission authority to impose reasonable requirements of the types found in the Commission's November 1, 2000 Order. Exercising authority granted by the General Assembly can not be said to contravene the General Assembly's intent. Nor does the reasonable use of the authority granted interfere with CILCO's easement rights. The Commission also finds that it is not bound by the circuit court's determination in Buchanan.~~

2. For the reasons stated in CILCO's Brief on Exceptions, Section III.B.3 beginning on page 10 of the HEPO should be modified as follows:

3. Commission Conclusion

~~From the outset, it is clear that CILCO has not met its own targeted tree trimming cycle. CILCO does not deny that it has failed to do so, but instead offers explanations in attempt to justify its neglect of its tree trimming obligation. The Commission has no reason to doubt that CILCO's system experienced significant damage during a harsh storm in 1998, but this fact does not excuse CILCO from its vegetation management duties prior to and after 1998. Nor does it excuse CILCO from not even coming close to meeting its tree trimming goal for 1998 alone. Varying tree sizes and conditions should also be accounted for when planning tree trimming activities since it is a given that tree sizes and conditions will differ from one location to a next. "Inconsistent funding of the line clearance program" is the poorest justification for not trimming trees. CILCO does not dispute that contact between overhead conductors and trees pose a significant threat to public health, safety, and reliability, yet funding priorities in other areas of CILCO's operations appear to take precedence over these concerns. The Commission is alarmed that safety is not higher among CILCO's concerns.~~

The photographs attached to the Report which initiated this docket are also of interest. While CILCO can not be expected to totally eliminate vegetation contact with all of its electric conductors at any given moment, the fact that such growth exists in various locations in CILCO's service territory corroborates Staff's claims that CILCO has not been trimming trees as it should. That contact with CILCO's electric conductors has occurred is apparent from the burning shown in the photographs. Although the Commission is not aware of any injuries stemming from any of the photographed situations, nor any other similar situation in CILCO's territory, the Commission need not wait for an accident to require CILCO to improve tree trimming since the risk of injury is clear.

The Commission is also unpersuaded by CILCO's argument that no action is merited since no one has allegedly complained about CILCO's tree trimming activities. By its own admission, CILCO does not keep records of customer complaints about the manner in which it trims trees and as a general matter lacks complete records of its tree trimming activities. While it may be true that CILCO has received no complaints, given its lack of records the Commission questions how CILCO can be so sure that no one has ever complained about the manner in which CILCO trimmed trees. Another potential explanation for a lack of recorded complaints may be that since CILCO has not been trimming trees in many areas, there is simply no activity about which to complain.

Moreover, contrary to CILCO's assertions, including requirements similar to those in Finding 7(A) of the November 1, 2000 Order would not necessarily interfere with CILCO's easement rights. On rehearing, CILCO agreed to implement a four-year tree trimming cycle by December 31, 2002. The record contains no evidence that CILCO has in the past ignored the property rights of the servient estate, ignored previous pruning history, tree health and tree aesthetics or otherwise in any manner trimmed trees in a manner inconsistent with the standards identified in Section 8-505.1. CILCO's existing Line Clearance Procedures Manual appears to have incorporated the aforementioned standards. So long as any requirements imposed by the Commission are reasonable and do not bar CILCO from making reasonable use of its easements, such requirements are permissible. The Commission also notes that CILCO's authority under its easement agreements must be exercised in a reasonable manner, as discussed in the cases cited by CILCO in its Initial Brief. For these reasons, the Commission agrees with CILCO that it is unnecessary to complicate the order by appending nebulous standards such as tree aesthetics to the guidelines specified in the statute, especially in the absence of any specific factual situations that would justify the need for a resolution of the hypothetical problems such language could cause.

What is troubling to the Commission is that CILCO interprets its easements as giving it unfettered authority to manage vegetation regardless of the concerns of or interpretation of the same easement by the holder of the servient estate. Although CILCO's 42,000 separate easement agreements may generally give it the right to trim or remove trees that endanger or could endanger the operation of its lines within the easements, it is not clear from the collection of actual easement agreements attached to Mr. Tate's surrebuttal testimony that CILCO has the same degree of authority or right to trim trees under all of its easement agreements. Mr. Tate testifies that when a tree crew is trimming along a particular circuit, it may not know what authority it has to trim trees in each parcel through which the circuit passes. While the Commission has no intention of identifying the particular rights that exist under each of CILCO's easement agreements, the possibility that tree crews do not know whether they have any right to enter upon property to trim trees suggests to the Commission that CILCO may need to pay closer attention to the rights that it has under its easement agreements. Lastly, the Commission is concerned by language in Section 2.4 of CILCO's Line Clearance Procedures Manual which indicates that tree crews should enter private property and trim or remove a tree even if the property owner has not consented. While there may be situations in which such behavior is merited, Section 2.4 is not limited to any particular situations. CILCO's Line Clearance Procedures Manual has been entered into the record as Staff Cross Exhibit 3.

Staff apparently fears that in the absence of the requirements in Finding 7(A) of the Commission's November 1, 2000 Order, CILCO may do more harm than good in its haste to achieve a four-year tree trimming cycle by December 31, 2002. In recognition of the amount of work that needs to be done by CILCO and the public interests involved in electric utility vegetation management, the Commission finds that it is appropriate to exercise its authority over tree trimming and prescribe specific steps and considerations that should be followed by CILCO to protect both CILCO and the public. The types of considerations recommended by Staff and found in Finding 7(A) may be reasonably required in this situation. Given the numerous interests at stake, the Commission would be remiss in its duty to the public if it required CILCO to trim trees without taking into account various competing interests inherent to vegetation management. How CILCO should account for the various considerations will be addressed in the following section

3. For the reasons stated in CILCO's Brief on Exceptions, Section IV.B.1.c, beginning on page 17 of the HEPO should be modified as follows:

c. Commission Conclusion

~~In accounting for the considerations identified in Finding 7(A), the Commission recognizes that a balancing of sometimes subjective and objective judgments must be performed. The standard by which to judge whether CHLCO has properly balanced the various considerations is reasonableness, as discussed in many of the cases cited by CHLCO. Requiring individuals and other entities to act reasonably is not a new standard. CHLCO already must exercise reasonableness under certain provisions of the Act. Section 9-101, for example, requires that CHLCO's rates be just and reasonable and that any rules and regulations relating to its rates be just and reasonable. Similarly, Section 9-213 requires that the cost of new generating plants or additions to existing generating plants be reasonable. Even when an easement agreement exists, CHLCO must exercise its rights under that agreement reasonably. This means, at least in part, that CHLCO may not go beyond that which its easement rights allow. The Commission is concerned that CHLCO may not always act within the terms of its easement agreements. In determining how the considerations of Finding 7(A) should be interpreted and balanced, however, the Commission first notes its agreement with Mr. Buxton that safety to the public and CHLCO's employees should be of paramount concern. Therefore, the requirement that CHLCO consider public and worker safety, which needs no explanation, shall take precedence over the other considerations in Finding 7(A) of the November 1, 2000 Order.~~

~~The Commission also observes that many of the considerations to which CHLCO objects are already to some extent accounted for in CHLCO's vegetation management guidelines. The foreword of CHLCO's Line Clearance Procedures Manual discusses the importance of tree trimming to customer relations and references efficiency and safety as well. Page 1-1 addresses property rights. Page 3-1 states that tree trimming "shall be done to provide balanced emphasis on clearance for power lines, current tree welfare and symmetry." Page 3-3 adds that tree crews shall "[t]rim for line clearance in a manner to retain natural shape and symmetry as much as possible." Staff Cross Exhibit 2 consists of Section 35 of The Lineman's and Cableman's Handbook, which CHLCO uses as a reference manual for CHLCO line apprentices. Under the heading of "Line Clearance Objectives," the handbook states, "It [line clearance] should be accomplished while maintaining the health and beauty of the trees involved, the goodwill of property owners, and the safety of the trimming crew." (page 35-1) The handbook also states, "Ideally, climbers should be trained to recognize structural problems such as weak crotches and chronic disease symptoms, so that trimming and tree removal decisions result in optimum accomplishment." (Id.) Clearly, CHLCO already expects a balancing of the various considerations to occur. Given the contents of CHLCO's tree trimming guidelines, the Commission is not only stumped by how CHLCO's tree trimming program could deteriorate to its present condition, but is also perplexed by CHLCO's opposition to Finding 7(A)."~~

Of the considerations in Finding 7(A) to which CILCO objects, the Commission is most troubled by CILCO's resistance to any directive that it consider the rights of property owners. What rights CILCO and property owners have can hardly be a matter of subjective judgment. While its possible that language in easement agreements may be vague or subject to interpretation, what rights each party has can and should be determined when brought into question. As discussed earlier, it is also troubling that CILCO may not know what rights it has from one parcel to the next when managing vegetation along a circuit. Absent an emergency, CILCO should not enter upon property and trim or remove vegetation unless it has a legal right to do so or the property owner's permission. Nor is it acceptable for CILCO to ask for permission and still enter upon private property when permission is not granted, as the second paragraph of Section 2.4 of CILCO's Line Clearance Procedures Manual prescribes. Consistent with the Commission's earlier conclusion, however, CILCO must not be barred from entering private property without permission when an emergency situation exists. If, for example, a damaged electric conductor has fallen beyond CILCO's easement, CILCO should cross into private property to remedy the situation.

As for how CILCO should consider property owners' rights, CILCO should give each property owner at least seven days notice (or whatever minimum notice period is established in Section 8-505.1 in the event that it is later amended) that tree trimming activities are scheduled to begin. In this regard, the Commission notices that the door-hanger depiction contained in CILCO's Line Clearance Procedures Manual states that trimming will begin "within the next 1 to 7 working days." (page 1-3) The Commission directs CILCO to remedy this inconsistency with the notice requirements of the Act. The notice that customers receive should also advise property owners that they may question and/or raise objections to CILCO's vegetation management activities during the seven-day period preceding vegetation management activities. A toll-free telephone number for customers to use shall be provided as well. In the event that a property owner registers with CILCO an objection to the planned vegetation management activities, CILCO shall postpone its plans as they pertain to that parcel for a period of 20 days. During such time, the property owner and CILCO shall work to resolve their differences. If prior to the expiration of the 20 day period, the property owner submits a formal or informal complaint to the Commission or initiates court proceedings regarding CILCO's tree trimming plans, CILCO shall continue to postpone its vegetation management activities as they relate to that parcel until the proceeding is resolved. The notice CILCO provides to property owners must inform property owners of this process. The Commission acknowledges that no party recommended this particular time frame, but given its concurrence with Staff's concerns, the Commission finds that this reasonable time frame is necessary in order to protect both CILCO's and property owner's rights. The Commission stresses again, however, that CILCO need not halt its tree trimming activities in face of property owner objections if CILCO reasonably believes that not completing its

~~planned vegetation management activities will result in an imminent threat to public or worker safety. The Commission concludes that requiring CILCO to be aware of and consider property owners' rights in the aforementioned manner when managing vegetation is reasonable and does not conflict with the terms of any existing easement agreements.~~

Since previous pruning history is ~~so~~ closely tied to tree health, the Commission will address the two considerations together. CILCO's tree crews should consider tree health by attempting to recognize diseased and/or weak wood and understand their implications to safety and reliability. Trained tree crews should be able to make a reasonable determination of the health of a tree at the scene. CILCO's crews should also be mindful to not trim a tree in such a manner as to weaken the tree in a way that could lead to safety and reliability concerns in the future. As for prior pruning history, CILCO complains that it has no way of knowing how a tree was trimmed in the past. To the extent that prior pruning has lead to weak or diseased wood, and thereby impacted tree health, CILCO's tree crews should be conscious of that pruning history and act reasonably to address such in present and future trimming and/or removal decisions. The Commission does not find, however, that prior pruning history should be a separate consideration in this Order on Rehearing. Given its links to tree health, the Commission expects CILCO to consider a tree's previous pruning history, to the extent that it can be determined, when CILCO assesses a tree's health. Requiring CILCO to reasonably consider tree health in the manner described above is reasonable and will not impair any of CILCO's existing rights.

~~Tree aesthetics is perhaps the most difficult consideration to address, but it is necessary to do so given that it is inherent to the tree trimming process. While the Commission recognizes that arboriculturally sound trimming may produce aesthetically displeasing results, CILCO should still endeavor to retain as much of the natural shape of each tree as possible. For example, aesthetics should be considered and balanced when, as Mr. Buxton suggests, removal of a substantial portion of a tree's crown or the entire tree may be the cheapest option but is not absolutely necessary. If a tree's species, health, and proximity to electric conductors do not merit substantial trimming, CILCO should consider the tree's appearance when trimming. So long as CILCO can justify its trimming decision as being reasonable in the mind of the average person in light of the competing considerations, CILCO should not fear that it will held liable for neglecting aesthetics. Accordingly, the reasonable consideration of tree aesthetics shall remain as a requirement in this Order on Rehearing.~~

~~Efficient work production ties into all of the aforementioned considerations. From a cost perspective, the most efficient vegetation management plan may be to permanently remove any and all vegetation in the proximity of electric conductors. From the same perspective, the least efficient plan may be to only trim each tree,~~

shrub, and bush as needed. Neither, however, is acceptable. In balancing efficiency with the other considerations, the Commission expects CILCO's tree crews to weigh the costs that may be incurred or saved as a result of their tree trimming decisions against the impact of that decision on safety, reliability, property owner's interests, a tree's health, and aesthetics. The Commission fully anticipates that CILCO will, over time, spend more money trimming particular trees than would have been spent had the tree simply been cut down. The Commission finds such an outcome reasonable given the many functions that trees perform. At the same time, however, the Commission also expects that some trees, given their health and proximity to electric conductors, will be trimmed substantially and perhaps even removed because it would simply be too costly to continually return to the location to trim the tree and/or repair electric conductors. So long as CILCO exercises reasonable judgment in its consideration of efficiency, the Commission finds that the requirement that CILCO do so in this Order on Rehearing will not unreasonably subject CILCO to complaints and criticism.

The Commission has no delusions regarding the difficulty of the balancing which it expects of CILCO. The difficulty does not stem from this Order on Rehearing, but rather from the many competing interests inherent to electric utility line clearance. From its own line clearance guidelines, however, it is apparent that CILCO recognizes the many interests at issue and should therefore have experience in addressing them.

4. Section IV.A.4.c, beginning on page 22 the HEPO should be modified as follows:

c. Commission Conclusion

In light of the current state of CILCO's tree trimming program and CILCO's lack of complete records regarding its past tree trimming efforts, the Commission concludes that it is necessary to require CILCO to maintain those records sought by Staff. While the Commission is not insensitive to the fact that any record keeping requirement imposed on any entity is apt to create some level of burden, from the record it is clear that CILCO's current record maintenance system should already include much of what is required in Finding 7(D). The additional requirements that CILCO keep records on rework after failed inspections and all vegetation management-related customer complaints will not be unreasonably burdensome. Records on rework after a failed inspection will assist in determining how well CILCO's tree crews are doing their job on their first attempt, which relates to efficiency. Records on customer complaints concerning vegetation management will aid in ascertaining CILCO's responsive to customer concerns. In addition to whether the type of work is scheduled work, storm work, hot spot work, or rework after a failed inspection, CILCO should also continue to maintain records on work order trimming.

Accordingly, CILCO shall be required to organize its vegetation management records by circuit name or number and include in such records the beginning and ending work dates, a description of the kind of work, and information on disputes with property owners that consists of the property owners' names, the nature of the disputes, and CILCO's final actions. Such property owner dispute records shall be kept in instances where access or permission to trim is denied as well as when a customer complains, formally or informally, about the manner in which CILCO managed vegetation.

Such records must be kept for at least two complete cycles following the entry of this Order on Rehearing. After two complete tree trimming cycles have been completed, CILCO shall maintain the required records for the most recent complete cycle on an ongoing basis. In other words, CILCO shall always have available the aforementioned records for the most recent complete tree trimming cycle. ~~CILCO's apparent lack of commitment to its own existing record maintenance system does little to persuade the Commission that a two-year limit on maintaining records is merited.~~

5. For the reasons stated in CILCO's Brief on Exceptions, finding (5) on pages 24-25 of the HEPO should be modified as follows:

(5) the improvement in Finding (4) should include, at a minimum, the following requirements:


- (A) begin immediately to trim trees and otherwise manage vegetation as required by 83 Ill. Adm. Code 305 to provide maximum practical vegetation-to-conductor clearance giving reasonable consideration to ~~the rights of property owners,~~ public and worker safety, electric service reliability, tree health, and the natural shape of the tree ~~tree aesthetics,~~ and ~~efficient work production~~ as described in the prefatory portion of this Order on Rehearing;
- (B) achieve a four-year tree trimming cycle by December 31, 2002;
- (C) after achieving a four-year tree trimming cycle, continue trimming trees on a cycle of no longer than four years;

- (D) keep accurate records of its tree trimming program, covering at least two complete cycles, such records to include: organizing tree trimming records by circuit name or number; records of beginning and ending work dates; records describing the kind of work (e.g., scheduled work, storm work, hot spot work, rework after a failed inspection, work order trimming); and records of all disputes with and complaints from property owners that document property owners' names, the nature of the disputes, and CILCO's final actions; subsequent to the completion of two complete tree trimming cycles following entry of this Order on Rehearing, CILCO should maintain the required records for the most recent complete cycle on an ongoing basis;
- (E) conduct random inspections of at least ten percent of tree trimming work performed by each contract crew within 60 days after the work is completed until March 1, 2003, compliance may be achieved by inspecting ten percent of line miles;
- (F) file quarterly reports, signed by a CILCO corporate officer, with the Commission's Chief Clerk with copies to the Energy Division, the first quarterly report to be filed by August 1, 2001; explain the percentage and number of transmission and distribution circuits trimmed since January 1, 1999; provide details of plans, schedules, and budgets to trim the remainder of the distribution and transmission circuits by December 31, 2002; break all schedules and budgets down to at least the quarterly level; include both incremental and cumulative schedules and budgets; explain what actions CILCO has taken or will take to meet the record keeping requirements; subsequent quarterly reports shall explain CILCO's progress toward achieving a four year tree trimming cycle; divide each calendar year into four quarters; file each quarterly report within 30 days after the end the quarter; compare the tree trimming work completed and the expenses during the quarter to the work schedules and budgets from the first quarterly report; include cumulative comparisons; show all schedule and budget changes made during the quarter; include the results of all inspections of the work of contract crews; CILCO should stop filing quarterly reports after reporting the achievement of a four year tree trimming cycle; state in the last quarterly report that CILCO will file no more quarterly reports; this final

quarterly report should confirm that CILCO has a record of keeping system in place that satisfies the Commission's Order on Rehearing.

Respectfully submitted,

CENTRAL ILLINOIS LIGHT COMPANY

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